



Martinsville Region
Environmental, Safety and Regulatory Compliance

Marathon Pipe Line LLC

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August 16, 2006

Department of the Interior
Minerals Management Service
381 Elden Street
MS - 4024
Herndon, Virginia 20170-4817

ATT: Rules Processing Team

RE: RIN 1010 - AD18

Gentlemen:

Marathon Pipe Line LLC (MPL) operates approximately 220 miles of pipeline on the Outer Continental Shelf (OCS). MPL supports the Minerals Management Service (MMS) in their effort for constant improvement of the regulations for oil, gas and sulphur operations in the OCS.

After reviewing the proposed revisions published in the Federal Register (FR Doc E6-10401, Filed 6-30-06), MPL respectfully submits the following comments:

Regulation: 250.192 "What reports and statistics must I submit relating to a hurricane, earthquake, or other natural occurrence?"

(b) If your facility, production equipment, or pipeline is damaged by a hurricane, tropical storm, earthquake, or other natural occurrence, you must:

(1) Submit a report to the Regional Supervisor within 48 hours after you complete your initial evaluation of the damage. You must use Form MMS-143 to make this report and all subsequent reports.

(2) Submit subsequent reports on a weekly basis until the damaged structure or equipment is returned to service. In the final report, you must provide the date the item was returned to service.

Comment:

It is unclear whether Form MMS-143 is in addition to, or in lieu of, reports required by NTL's, such as NTL No. 2005-G20.

If a hurricane enters the Gulf of Mexico, will the MMS publish an NTL directing pipeline operators to perform an inspection and submit inspection results? Further, if damage is discovered, will this initiate the proposed reporting requirements using Form-143? If so, we believe that this is redundant reporting and would not

enhance the MMS information collection process. The MMS should clearly identify a single reporting method. However, MPL supports the existing NTL process.

Form MMS-143 was not provided for review with the proposed rule. It is unclear to MPL the amount and type of information that would be required.

Also, MPL feels monthly reporting is sufficient. Due to the nature of offshore activities during post-Katrina and Rita damage assessment and repair, it became very apparent that significant progress covered an extended period of time. Weekly reporting would likely contain no new information and could over-burden MMS resources and actually delay a response to an operator on another issue.

Regulation: 250.919 "What in-service inspection requirements must I meet?"

(a) You must submit a comprehensive annual in-service inspection plan covering all of your platforms to the Regional Supervisor for approval by April 1 of each year. As a minimum, your plan must:

Comment:

The language in 250.919(a) references platforms, however, the language used in the Supplementary Information section appears to include pipelines. The language should clarify that this regulation applies exclusively to platforms and excludes pipelines.

Thank you for allowing Marathon Pipe Line LLC to comment on the proposed revision to MMS regulations.

Sincerely,

Allen D. Lowry
Marathon Pipe Line LLC
Regulatory Compliance